

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING et al.,**

**Plaintiffs,**

**vs.**

**BRIAN P. KEMP et al.**

**Defendants.**

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**CIVIL ACTION FILE NO.  
2017-CV-02989-AT**

**NOTICE OF CONSENT**

**DEFENDANTS** Maxine Daniels, Michael Coveny, Anthony Lewis, Leona Perry, Samuel Tillman, and Baoky Vu and Defendant DeKalb County Board of Registrations and Elections (“DeKalb Defendants”) submit this **Notice of Consent to Joint Status Report [Dkt. No. 210]**, showing the Court as follows:

1. The Court instructed the parties to confer and submit a status report and proposed schedule regarding the determination of which DRE machines shall be sequestered for purposes of this litigation. [Dkt. No. 205].
2. The parties conferred regarding a proposed schedule for the exchange of information concerning DRE machines. [Dkt. No. 210].
3. The DeKalb Defendants assented to the proposed joint status update as circulated by Plaintiff’s Counsel Robert Manoso as seen in the following screenshot:



Thu 5/17/2018 4:50 PM

Bryan, Bennett D

RE: 17-0167 Curling, et al v. Kemp, et al: Evidence Preservation Issues and Precinct-Level DRE Machine Use by Election

To 'Manoso, Robert W.'

Looks good to me

Bennett Bryan  
Ga. Bar No. 157099  
Senior Assistant County Attorney  
DeKalb County Law Department  
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[bdryan@dekalbcountyga.gov](mailto:bdryan@dekalbcountyga.gov)

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**From:** Manoso, Robert W. [<mailto:RManoso@mofo.com>]

**Sent:** Thursday, May 17, 2018 4:45 PM

**To:** Daniel White; Bryan, Bennett D; Chapple, Catherine L.

**Cc:** Robert McGuire; John Salter; Johnson, Laura K.; Cheryl Ringer; David Lowman; Kaye Burwell; Grant Schnell; Robert Highsmith; Roy Barnes; Bruce Brown; Cary Ichter; [william@nphlaw.com](mailto:william@nphlaw.com); Adam Sparks; Cross, David D.; Halsey Knapp; Bentrott, Jane P.; Carlin, John P.; Miriyala, Arvind S.; Marilyn Marks

**Subject:** RE: 17-0167 Curling, et al v. Kemp, et al: Evidence Preservation Issues and Precinct-Level DRE Machine Use by Election

See attached.

I have attempted (with my limited table skills) to have each party be able to add their respective signature line that we will then fold into the document to be filed with the Court this evening. We will likely be unable to file until 10 p.m. or so given travel schedules so if someone wishes it to be filed earlier then they will need to do so. Thanks.

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**From:** Daniel White [<mailto:dwhite@hbw-law.com>]

**Sent:** Thursday, May 17, 2018 3:55 PM

**To:** Manoso, Robert W.; Bryan, Bennett D; Chapple, Catherine L.

**Cc:** Robert McGuire; John Salter; Johnson, Laura K.; Cheryl Ringer; David Lowman; Kaye Burwell; Grant Schnell; Robert Highsmith; Roy Barnes; Bruce Brown; Cary Ichter; [william@nphlaw.com](mailto:william@nphlaw.com); Adam Sparks; Conaway, Jenna B.; Cross, David D.; Halsey Knapp; Bentrott, Jane P.; Carlin, John P.; Miriyala, Arvind S.; Marilyn Marks

**Subject:** RE: 17-0167 Curling, et al v. Kemp, et al: Evidence Preservation Issues and Precinct-Level DRE Machine Use by Election

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- External Email -

Thanks Robert. Cobb can live with June 12 disclosure deadline and June 22 response from Plaintiffs. We appreciate your willingness to ask your experts turn the response around sooner if we're able to get the info to you ahead of the June 12 deadline. Go ahead and circulate a proposed schedule if you have one drafted.

4. DeKalb Defendants have reviewed the changes made by the Plaintiffs and Cobb County last night. DeKalb Defendants do not object to the joint status report as filed and join in the same.

Respectfully submitted this 18th day of May, 2018.

LAURA K. JOHNSON  
DEPUTY COUNTY ATTORNEY  
Georgia Bar No. 392090

Terry G. Phillips  
SUPERVISING ATTORNEY  
Georgia Bar No. 576865

*/s/ Bennett D. Bryan*  
Bennett D. Bryan  
SENIOR ASSISTANT COUNTY ATTORNEY  
Georgia Bar No. 157099  
Attorneys for Defendants

PLEASE ADDRESS ALL  
COMMUNICATIONS TO:

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2018, I electronically filed the foregoing **NOTICE OF CONSENT** with the CM/ECF system which will send electronic notification to all counsel of record.

/s/Bennett D. Bryan

Bennett D. Bryan  
Georgia Bar No. 157099